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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

J. DOE 1, et al.,
Individual and Representative Plaintiffs,
v.
GITHUB, INC., et al.,
Defendants.

Case Nos. 4:22-cv-06823-JST
4:22-cv-07074-JST

**DECLARATION OF TRAVIS
MANFREDI IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF SECOND AMENDED
COMPLAINT**

I, Travis Manfredi, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am an associate at the Joseph Saveri Law Firm, LLP, counsel of record for Plaintiffs Does 1–5 in this action. I have personal knowledge of the matters stated herein and, if called upon, I could competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 79-5(c) in support of Plaintiffs’ Administrative Motion to File Under Seal Portions of Second Amended Complaint (“Sealing Motion”).

2. Plaintiffs have reviewed and complied with the Standing Order Governing Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar.

3. Plaintiffs have reviewed and complied with Civil Local Rule 79-5. Plaintiffs’ redactions are narrowly tailored to seal only sealable material.

4. The following chart sets forth detail regarding the information Plaintiffs seek to file under seal:

SAC Paragraph(s) #	Description of Information	Reason for Sealing
19–23	Each paragraph contains one Plaintiff’s name	The Court has already determined it is appropriate for Plaintiffs to proceed pseudonymously at this stage due to Plaintiffs’ reasonable fear that credible threats of physical violence may be carried out. <i>See Doe 1</i> , 2023 WL 3449131, at *7-9.
113–115	Examples and descriptions of code Doe 2 made available to the public on GitHub.	To protect Doe 2 from credible threats of physical violence. Doe 2 could easily be identified by searching for this code on GitHub and other public repositories.
118–121 & 123	Examples and descriptions of code Doe 1 made available to the public on GitHub.	To protect Doe 1 from credible threats of physical violence. Doe 1 could easily be identified by searching for this code on GitHub and other public repositories.

126-130 & 134-137	Examples and descriptions of code Doe 5 made available to the public on GitHub.	To protect Doe 5 from credible threats of physical violence. Doe 5 could easily be identified by searching for this code on GitHub and other public repositories.
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5. The information sought to be filed under seal here is identical to the information this Court ordered filed under seal when it was included in Plaintiffs First Amended Complaint (ECF No. 135, correcting ECF No. 97).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of January 2024 at San Francisco, California.

/s/ Travis Manfredi
Travis Manfredi

E-FILING ATTESTATION

I, Joseph R. Saveri, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above have concurred in this filing.

/s/ Joseph R. Saveri

Joseph R. Saveri